

## Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. Claims 1, 11, 16 and 35 have been amended. Claims 2, 7, 12 and 34 were previously canceled. Claims 35-40 are canceled herein. Claims 41-44 have been added. Thus, claims 1, 3-6, 8-11, 13-33 and 41-44 are pending.

### CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Claims 1, 3-5, 11, 13-20, 23 and 35-40 were rejected as being unpatentable over U.S. Patent No. 6,266,341 issued to Surprenant, et al. (*Surprenant*) in view of U.S. Patent No. 6,674,750 issued to Castellano (*Castellano*). Claims 35-40 have been canceled. Therefore, the rejection of claims 35-40 is moot. For at least the reasons set forth below, Applicants submit that claims 1, 3-5, 11, 13-20 and 23 are not rendered obvious by *Surprenant* and *Castellano*.

Claim 1 recites:

a time slot management circuit coupled between the backplane interface and the network interface, the time slot management circuit to route the channels of data over the backplane to one or more predetermined destinations, wherein TDM traffic is routed to one or more selected links based on a corresponding destination interface card for transmission over the backplane and traffic of the second protocol is routed to one or more links to be looped back to a source interface card via the backplane.

Similarly, claim 11 recites:

routing the channels of data in the internal cell format via an asynchronous backplane connection to one or more predetermined destinations, wherein TDM traffic is routed to one or more selected links based on a corresponding destination interface card for transmission over the backplane and traffic of the second protocol is routed to one or more links to be looped back to a source interface card via the backplane.

Thus, Applicants claim routing of TDM traffic to selected links to transmission over the backplane and looping back non-TDM traffic to the source interface card. See, for example, pages 9-10 of the specification as filed for support. Claim 16 is a means plus function claim that recites limitations similar to claim 11.

*Surprenant* discloses communication of TDM data over a bus, but is not cited to teach, nor does it teach, looping back of non-TDM traffic. *Castellano* discloses transmission of multiple formats over a shared bus. However, non-TDM traffic is not looped back. Because neither *Surprenant* nor *Castellano* can teach or suggest loopback of non-TDM traffic, no combination of *Surprenant* and *Castellano* can render the invention as claimed obvious.

Claims 3-5, 20 and 23 depend from claim 1. Claims 13-15 depend from claim 11. Claims 17-19 depend from claim 16. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 3-5, 13-15, 17-20 and 23 cannot be rendered obvious by *Surprenant* and *Castellano*.

Claims 21, 22, 24, 25, 29, 31 and 32 were rejected as being unpatentable over *Surprenant* in view of *Castellano* and further in view of *DeNap*. Claims 21, 22, 24, 25 and 29 depend from claim 1. Claim 31 depends from claim 11 and claim 32 depends from claim 16. *DeNap* is cited to teach used of optical signals. However, *DeNap* does not cure the deficiencies of *Surprenant* and *Castellano*. Therefore, no combination of *Surprenant*, *Castellano* and *DeNap* teaches or suggests the invention as claimed in claims 21, 22, 24, 25, 29, 31 and 32.

Claims 27, 28 and 30 were rejected as being unpatentable over *Surprenant* in view of *Castellano* and further in view of *Degges* and *DeNap*. *Degges* discloses a

switching matrix for T1 frames. See col. 4, lines 5-10. *Degges* discloses use of only T1 frames. Therefore, *Degges* does not cure the shortcomings set forth above. *DeNap* is cited to teach use of optical signals. T1 frames can be carried as optical signals. Therefore, no combination of *Surprenant*, *Castellano*, *Degges* and *DeNap* teaches or suggests the invention as claimed in claims 27, 28 and 30.

Claim 33 was rejected as being unpatentable over *Surprenant* in view of *Castellano* and further in view of U.S. Patent No. 5,541,921 issued to Swenson, et al. (*Swenson*). *Swenson* is cited to teach a plurality of buffers to interface a backplane. However, *Swenson* does not cure the deficiencies of *Surprenant* and *Castellano*. Accordingly, no combination of *Surprenant*, *Castellano* and *Swenson* can teach or suggest the invention as claimed in claim 33.

#### NEW CLAIMS

Claims 41-44 have been added. Claims 41-44 depend from independent claims discussed above. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 41-44 are not rendered by the cited references for at least the reasons set forth above.

#### CONCLUSION


For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1, 3-6, 8-11, 13-33 and 41-44 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of

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the present application. Please charge any shortages and credit any overcharges to our  
Deposit Account number 02-2666.

Respectfully submitted,  
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